

HOLLAND & KNIGHT LLP

Kristopher L. Reed (SBN 235518)
kris.reed@hkklaw.com
One Arts Plaza
1722 Routh Street, Suite 1500
Dallas, TX 75201
Tel: (214) 964-9500 / Fax: (214) 964-9501

Kenneth S. Chang (SBN 211925)
ken.chang@hkklaw.com
Edward J. Mayle (admitted *pro hac vice*)
edward.mayle@hkklaw.com
1801 California Street, Suite 5000
Denver, CO 80202
Tel: (303) 974-6660 / Fax: (303) 974-6659

Attorneys for Defendants

KILPATRICK, TOWNSEND & STOCKTON LLP

April E. Isaacson (SBN 180638)
aisaacson@kilpatricktownsend.com
Two Embarcadero Center, Suite 1900
San Francisco, CA 94111
Tel: (415) 576-0200 / Fax: (415) 576-0300

Kevin M. Bell (admitted *pro hac vice*)
kbell@ktslaw.com
1400 Wewatta St., Suite 600
Denver, CO 80202
Tel: (303) 571-4000 / Fax: (303) 571-4321

Andrew W. Rinehart (admitted *pro hac vice*)
arinehart@kilpatricktownsend.com
1001 West Fourth Street
Winston-Salem, NC 27101
Tel: (336) 607-7300 / Fax: (336) 607-7500

Kathleen R. Geyer (admitted *pro hac vice*)
kgeyer@kilpatricktownsend.com
1420 Fifth Ave., Ste. 3700
Seattle, WA 98101
Tel: (206) 467-9600 / Fax: (206) 623-6793

Attorneys for Defendants

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

REGENTS OF THE UNIVERSITY OF
MINNESOTA,

Plaintiff,

v.

LSI CORPORATION AND
AVAGO TECHNOLOGIES U.S. INC.,

Defendants.

Civil Action No. 18-cv-00821-EJD

**DECLARATION OF EDWARD J.
MAYLE IN SUPPORT OF
DEFENDANTS' MOTION *IN LIMINE* TO
PRECLUDE ARGUMENT AND
EVIDENCE THAT UMN "INVENTED
MTR" OR THAT LSI IS LIABLE FOR
INFRINGEMENT CLAIM 13**

I, Edward J. Mayle, under 28 U.S.C. §1746, hereby declare:

1. I am counsel for LSI Corporation and Avago Technologies U.S. Inc.

(collectively, "Defendants") in this case. I am licensed to practice law in Colorado and the

DECLARATION OF EDWARD J. MAYLE IN SUPPORT OF DEFENDANTS' MOTION *IN*
LIMINE TO PRECLUDE ARGUMENT AND EVIDENCE THAT UMN "INVENTED MTR"
OR THAT LSI IS LIABLE FOR INFRINGING CLAIM 13
CASE NO. 18-CV-00821-EJD

1 District of Columbia, and am admitted to practice before this Court *pro hac vice*. I make this
2 declaration based on my personal knowledge, and, if called upon as a witness, could and
3 would testify competently to the matters set forth below.

4 2. Attached as Exhibit 1 is a true and correct copy of the Patent Office's Inter
5 Partes Review Certificate for U.S. Patent No. 6,859,601, stating "Claim 13 is cancelled."

6 3. Attached as Exhibit 2 is a true and correct copy of a photograph provided by
7 Plaintiff in this case; the photograph allegedly shows a plaque for a "NSIC Technical
8 Achievement Award."

9
10 I declare under penalty of perjury that the foregoing is true and correct.
11 Executed on February 13, 2025, at Denver, Colorado.

12
13 By: /s/ Edward J. Mayle

14 Edward J. Mayle (admitted *pro hac vice*)
15 HOLLAND & KNIGHT LLP
16 *edward.mayle@hklaw.com*
17 1801 California Street, Suite 5000
Denver, CO 80202
Tel: (303) 974-6660 / Fax: (303) 974-6659

18 Attorney for Defendants LSI Corporation and
19 Avago Technologies U.S. Inc.